

## **ARMY/BAE Response to EPA Show Cause Letter Findings**

### **Wastewater Compliance (CWA NPDES)**

#### **No alleged violations noted**

#### **Areas of Concern**

**1.**

ATK will answer re: EPA's concern with oily pools of stormwater that were present in the Roads and Grounds vehicle storage area.

BAE, operating at RFAAP, takes reasonable measures to minimize oil-contaminated stormwater runoff from vehicles parked at the heavy equipment storage lot. BAE monitors stormwater runoff according to the discharge provisions in the RFAAP VPDES wastewater discharge permit and there have been no violations (to date) since BAE began operations at RFAAP on July 1, 2012.

**2.**

ATK will answer re: EPA's concern with oily pools of stormwater that were present at the transformer storage yard.

BAE, operating at RFAAP, takes reasonable measures to minimize oil-contaminated stormwater runoff from all equipment storage lots. BAE monitors stormwater runoff according to the discharge provisions in the RFAAP VPDES wastewater discharge permit and there have been no violations (to date) since BAE began operations at RFAAP on July 1, 2012.

**3a.**

ATK will answer re: EPA's concern with coal sediment outside the storage area on the day of the inspection.

Since July 1, 2012, BAE has worked with its coal supply contractors to put operating procedures in place to keep coal sediment within the storage area boundaries. BAE takes reasonable measures (within the context of a coal storage pile in daily operation) to minimize the amount of coal sediment that occurs outside of the storage containment area.

**3b.**

ATK will answer re: EPA's concern with Lead and other materials being stored outside on the day of the inspection.

Since July 1, 2012, BAE has put operating procedures in place to ensure that Lead and other materials are kept under covered shelter. In addition, BAE does not store contaminated debris

in such a way that it causes a violation of the stormwater discharge provisions of RFAAP's VPDES discharge permit.

**4.**

The suspected cross connection, i.e., acidic wastewater entering the sanitary wastewater collection system, that was noted by the EPA inspectors during the 2011 inspection, has been repaired as a result of a system-wide RFAAP acidic wastewater sewer rehabilitation project.

Since July 1, 2012, RFAAP sanitary wastewater monitoring records indicate that there have been no issues with low pH/acidic wastewater entering the sanitary sewer collection system.

#### **Wastewater/Stormwater (CWA SPCC)**

##### **No alleged violations noted**

##### **Areas of Concern**

ATK will answer the question in a separate document re: SPCC Plan updates prior to BAE taking over as operating contractor on July 1, 2012.

Since July 1, 2012, BAE has maintained the installation's SPCC plan according to the applicable regulations.

#### **Air Compliance (CAA Title V and Stationary Refrigeration Equipment)**

##### **Violations**

##### **1a. through m.**

ATK will answer for all alleged CAA Title V violations that occurred before July 1, 2012.

Since July 1, 2012, BAE is managing the installation's CAA Title V program according to applicable regulations.

##### **2.**

ATK will answer re: stationary refrigeration equipment recordkeeping violations that occurred before July 1, 2012.

Since July 1, 2012, BAE is managing the installation's stationary refrigeration equipment recordkeeping in good order according to applicable regulations.

ATK will answer re: petroleum release detection and recordkeeping violations that occurred before July 1, 2012.

Since July 1, 2012, BAE is managing the installation's petroleum release detection system in good order according to applicable regulations.

##### **No Areas of Concern**

## **Risk Management Plan (CAA 112r)**

### **No Alleged Violations noted**

#### **Areas of Concern**

ATK will answer re: EPA's CAA 112r concerns that occurred before July 1, 2012.

Since July 1, 2012, BAE is managing the installation's CAA 112r program according to applicable regulations.

## **Hazardous Waste (RCRA, C)**

### **Violations**

#### **1a. through h.**

ATK will answer re: hazardous waste management violations that occurred before July 1, 2012.

Since July 1, 2012, BAE is managing the installation's hazardous waste (RCRA) program and has instituted several changes to assure compliance with the applicable regulations.

#### **2a.**

Since the EPA MM inspection in 2011, (b) (7)(F)(b) (7)(F) has been using the Lamptacker boxes provided by Waste Management Corporation for managing their Universal Waste spent lamps.

#### **2b. and c.**

ATK will answer re: universal waste violations that occurred at the installation (under ATK control) before July 1, 2012.

Since July 1, 2012, BAE manages its universal waste in accordance with Federal regulations.

#### **3a. and b.**

ATK will answer re: Land Disposal Restriction violations that occurred before July 1, 2012.

Since July 1, 2012, BAE complies with all applicable regulations regarding Land Disposal Restrictions.

#### **Areas of Concern**

#### **1a. through c.**

ATK will answer re: EPA's TSD permit concerns that occurred before July 1, 2012.

Since July 1, 2012, when BAE took over RFAAP operations, the Company's operational policy is to NOT accumulate demolition debris for more than 90 days. Occasionally, there is a need to decontaminate pieces of equipment for safety reasons prior to regular maintenance work on

the equipment. This equipment (which may include valves, piping and other metal parts) is not to be considered hazardous waste. In addition, lead metal sheets and smaller pieces of lead metal are re-used in performing maintenance at many facilities at RFAAP. Thus, the lead metal material is not a hazardous or solid waste.

**1d.**

This area of concern was not included in EPA's 2011 inspection report, but was part of the 2014 EPA inspection performed by NEIC. The wastewater in Tank (b) (7)(F) is being managed in accordance with the facility's VPDES wastewater permit. The nitrocellulose (NC) material stored within is an energetic product manufactured at RFAAP for military and commercial use. The NC material is stored and maintained in a water-wet state for safety reasons.

**2.**

ATK will answer re: EPA's incinerator roof concerns that occurred before July 1, 2012. Prior to July 1, 2012, the (b) (7)(F) incinerator roof structure was replaced with a metal structure after a fire.

Prior to July 1, 2012, when ATK was conducting the operations at RFAAP, stainless steel stacks along with a metal pump houses were installed at (b) (7)(F) to prevent an unsafe condition that could result in an incinerator roof fire. Since July 1, 2012, BAE has operated both incinerators safely and without incident.

**3.**

ATK will answer re: EPA's incinerator grinder building concerns that occurred before July 1, 2012.

The basement floor (b) (7)(F) is coated with a conductive material for safety reasons. This material is not applied as a secondary containment material. Secondary containment within building (b) (7)(F) is maintained by the integrity of the underlying structural concrete pad. BAE conducts regular inspections of the secondary containment of this structure to ensure its functional operability.

**4.**

ATK will answer re: EPA's incinerator ash handling concerns that occurred before July 1, 2012.

For safety reasons, the satellite accumulation areas containers (within the hazardous waste incinerator buildings) are sized to be larger than 55 gallons. The larger "catchment/cooling" containers allow the hot material to be collected and cooled down more quickly so that it can safely be transferred to the 55 gallon containers. BAE applies the use of administrative controls to prevent the accumulation of more than 55 gallons of waste in the larger "catchment/cooling" containers.

## **Underground Storage Tanks (RCRA, I)**

### **Violations**

ATK will answer re: UST leak detection reporting violations that occurred before July 1, 2012.

Since July 1, 2012, BAE (operating at RFAAP) has followed all regulations regarding the proper reporting of UST operations.

#### **Areas of Concern**

ATK will answer re: EPA's UST 7220-3 leak rate concerns that occurred before July 1, 2012.

Since July 1, 2012, BAE (operating at RFAAP) has followed all regulations regarding the proper reporting of UST operations.

#### **CERCLA**

##### **Violations**

ATK will answer re: National Response Center (NRC) reporting violations that occurred before July 1, 2012.

Since July 1, 2012, BAE (operating at RFAAP) has complied with all applicable CERCLA reporting regulations.

##### **No Areas of Concern**

